

MAR 03 1989

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SDMS Document



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CERTIFIED MAIL P-545 546 783
RETURN RECEIPT REQUESTED

H. Gilbert Weil
Facility Coordinator
Union Carbide Corporation
P.O. Box 670
Bound Brook, New Jersey 08805

Re: Scientific Chemical Processing ("SCP") Site - Carlstadt, N.J.
ARAR Note No. 2: Polychlorinated Biphenyls ("PCBs")
Administrative Order Index No. II CERCLA-50114 ("the Order")

Dear Mr. Weil:

As you are aware, the data submitted to EPA in the draft Remedial Investigation report, dated September 1988 (which was prepared by the Respondents to the above Order) indicated that high levels of PCBs exist in the soil throughout the SCP Site.

PCBs were discovered in thirty (30) of thirty-four (34) soil samples taken at the Site. One soil sample even indicated the presence of PCBs at a concentration of 15,000 parts per million ("ppm") near the surface of the Site.

The highest concentrations of PCBs found at the Site were in the form of Aroclor 1242. The mean concentration of Aroclor 1242 in the unsaturated (above the water table) soil was 1416 ppm. The mean concentration of Aroclor 1242 in the saturated (below the water table) soil was 72.6 ppm. Aroclor 1242 was the most pervasive form of PCB at the Site. However, other Aroclor types, including Aroclor 1248, 1254 and 1260, were also detected in soil both above and below the water table at the Site. The presence of these other forms thereby indicates that Aroclor 1242 alone represents only a portion of the total PCB levels which exist at the Site.

An aquifer exists within a few feet of the surface of the Site. This aquifer has been classified as a Class GW2 system, i.e., as a potential potable water supply. This aquifer has, however, been and continues to be in direct contact with PCBs in soils. The aquifer is therefore a pathway for PCBs to migrate and leach from soils into groundwater. Likewise, Peach Island Creek, which adjoins the Site and in which PCBs have already been detected, can receive both runoff of PCB laden soils and/or sediments and discharge of PCB contaminated groundwater from aquifers beneath the Site.

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The groundwater data which the Respondents submitted to EPA, indicates that Aroclor 1242 levels in groundwater are at present at least four (and possibly six) orders of magnitude greater than the groundwater standard for total PCBs (0.000001 ppm PCBs) in the water table aquifer beneath the Site.

The magnitude of and the frequency with which PCBs have been detected in the soil and groundwater at the Site indicate gross and pervasive PCB contamination exists across the entire Site. The PCB data also indicates that PCBs and/or materials containing PCBs were "spilled" or otherwise released onto the soil across virtually all areas of the Site and that PCBs have already migrated down into the water table and into the soil which is in contact with the water table at almost all of the locations sampled to date.

It is also highly probable that PCBs have and will continue to migrate within and from this Site until adequate remedial measures are completed.

Please be advised that EPA - Region II has concluded that the 25 ppm total PCB cleanup requirement set forth at 40 CFR Part 761.125(c)(3)(v) must be met for all soil which exists at the SCP Site. This level (and levels lower than 25 ppm) has been and are being used as the target level for cleanups of PCBs in soil at numerous NPL Sites in EPA-Region II and throughout the country regardless of whether cleanups are being performed with federal funds or under a private party response (e.g., at Wide Beach, N.Y. (10 ppm), Burnt Fly Bog, N.J. (5 ppm), Goose Farm, N.J. (5 ppm), Renora, N.J. (5 ppm)).

Site specific risk factors or compliance with any other federal or state requirements may mandate additional treatment and/or removal to levels which are lower than the 25 ppm level stated above.

This letter revises and supersedes the entire section entitled "National PCB Spill Cleanup Policy" on page 11 of the document entitled "Identification of ARARs for Developing Remedial Alternatives" which was mailed to counsel for the Respondents on July 27, 1988 by the EPA - Region II. It does not supersede any other parts of that document which make reference to any more stringent soil cleanup levels.

The Feasibility Studies which are presently underway should immediately utilize this soil cleanup requirement in screening and assessing options for the first operable unit for the Site.

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If there are any questions concerning this matter, please contact James Rooney in the Office of Regional Counsel (212-264-3297) or Janet Feldstein (212-264-0613) at your convenience.

Sincerely yours,

Raymond Basso, Chief
New Jersey Compliance Branch

cc: Thomas Armstrong, General Electric Co.
William Warren, Cohen Shapiro et al
Pamela Lange, NJDEP
Harry Yeh, EBASCO

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Facility Coordinator
UNION CARBIDE CORPORATION
P.O. BOX 676
BOUND BROOK, NJ 08225

4. Article Number
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